

**IN THE UNITED STATES COURT OF FEDERAL CLAIMS
BID PROTEST**

CACI, INC.-FEDERAL,)	
)	
Plaintiff,)	Case No. <u>21-1823 C</u>
v.)	
)	Judge _____
THE UNITED STATES OF AMERICA,)	
)	
Defendant,)	
)	
)	
)	

MOTION FOR LEAVE TO FILE UNDER SEAL

Plaintiff, CACI, Inc.-Federal (“CACI”), requests leave to file its Complaint and documents in support thereof in this bid protest under seal as allowed by Rules of the Court of Federal Claims, Appendix C, Section III.

CACI is an offeror in response to the solicitation issued by the U.S. Army, under which the Army issued awards that CACI is protesting. CACI’s Complaint contains confidential and proprietary information including trade secrets and competitively sensitive information, the release of which would cause substantial and irreparable harm to CACI. CACI has contemporaneously filed a motion for a protective order to be issued by the Court in this matter.

Pursuant to the Court’s rules, CACI is simultaneously filing a redacted copy of the Complaint.

WHEREFORE, CACI respectfully requests that the Court issue an order granting this motion.

Respectfully submitted,

/s/ Gary J. Campbell

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Dated: September 8, 2021

CERTIFICATE OF SERVICE

I hereby certify that on this 8th day of September, 2021, I electronically filed a copy of the foregoing using the CM/ECF system, which sent a notification of such filing to counsel of record.

s/ Gary J. Campbell
Gary J. Campbell